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September 13, 2022

**BY ECF**

The Honorable Katharine H. Parker, U.S.M.J.  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 750  
New York, NY 10007

**Cohen v. Group Health Incorporated, Case No. 1:22-mc-00200-PAE-KHP:**

**Letter Responding to the Order on Sealing (ECF 17)**

Dear Judge Parker:

This firm represents Respondent Group Health Incorporated (“GHI” or “Respondent”) in the above-referenced miscellaneous action. With the consent of Mr. Cohen and Plaintiffs’ counsel in the underlying action—*Steven Plavin, et al., v. Group Health Incorporated*, No. 17-CV-01462-RDM (M.D. Pa.)—we write to inform the Court that the parties have met and conferred in accordance with the Court’s August 30, 2022 Order (ECF 17), and have agreed that it is not necessary for the exhibits attached to the Kagan Declaration (ECF 13) (the “First Kagan Decl.”) to be filed under seal.

Plaintiffs’ counsel has requested, however, that Exhibits 4 and 6 to the First Kagan Decl. (ECF 13-4 and 13-6) be filed with certain PII redactions pursuant to SDNY ECF Rules 21.3–21.5 (see attached Exs. A and B), which the parties understand does not require a sealing order. With the Court’s approval, the Respondent proposes to refile the Kagan Declaration (ECF 14) (the “Second Kagan Decl.”) and all supporting exhibits (including the newly redacted exhibits 12 and 14) in their entirety, by a date set by the Court so that all relevant exhibits appear in one docket entry.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Jared I. Kagan  
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The Hon. Katharine H. Parker, U.S.M.J.

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*Counsel to Respondent Group Health  
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cc: Steve M. Cohen (by ECF)  
Counsel of Record in the underlying action (by email)